

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)
)
Amendment of Part 97 of the Commission's)
RM-10413 Amateur Service Rules Governing)
Operating Privileges)
)

PERSONAL COMMENTS OF JAMES MICCOLIS, N2EY

OVERVIEW

These comments are in response to the ARRL proposal for "refarming" the existing HF "Novice sub-bands" on the 80, 40 and 15 meter bands.

I. Discussion:

The ARRL petition does not address the implementation of new technologies by radio amateurs as repeatedly requested by the Commission in WT Docket 98-143. The ARRL petition simply proposes the elimination of the Novice subbands and their reallocation to existing popular modes, primarily analog voice and image. The ARRL polling method did not address any spectrum allocation alternatives other than possible changes to the existing subband structure.

I propose that the Commission take this opportunity to provide the Amateur Radio Service with a new incentive to try out new modes on the amateur HF bands by permitting and encouraging the use of new, experimental and nontraditional modes in the Novice subbands without the need for a Special Temporary Authority (STA).

Advances in technology, changes in the license structure and test requirements have eliminated the need for special HF subbands for Novice and Technician Plus licensees. The "Novice subbands" have outlived their regulatory purpose, so I propose they be reallocated to enhance the ability of the Amateur Radio service "to contribute to the advancement of the radio art".

II Proposal:

- A. To "de-populate" the current Novice segments, I propose that all Novice (and Technician with code credit) licensees be authorized to use Morse code (CW) in all of the MF/HF spectrum now authorized for General class licensees, using the current power output level restriction of 200 watts.
- B. I propose that the current Novice sub-bands be reallocated for non-traditional and experimental modes such as digitized voice, digitized image, high speed data, and other forward looking communications methods. Modes currently allowed in these segments would continue to be allowed without restriction.
- C. I propose that Commission grant broad discretion to amateurs in the technical aspects of mode use in these subbands as to modulation and coding schemes, non-traditional technologies, and data/symbol rates. Specifically, the current limitations on occupied bandwidth and

data/symbol rate limitations would not apply in these subbands, provided the occupied bandwidth of a signal is entirely within the experimental subband. The encoding and modulations used would be required to be documented according to current Commission rules. This broad discretion would only apply within the experimental subbands, in order to minimize interference. "Analog" voice modes such as SSB and AM would not be allowed in these subbands.

III. Conclusion

I have held an amateur license since 1967 and been an ARRL member since 1968. I responded to the ARRL poll but was frustrated by the limited options offered by the poll. In most cases I agree with the ARRL position, but this proposal lacks vision for the future of amateur radio. "Refarming" the Novice subbands to experimental use will facilitate and encourage experimentation by radio amateurs without the need for extensive rule changes or extra paperwork, and will avoid most interference issues between users of existing modes and experimental modes.

Respectfully submitted,

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